

# EXHIBIT E



*CULLENandDYKMAN LLP*

---

**Garden City Center  
100 Quentin Roosevelt Boulevard  
Garden City, New York 11530-4850  
Telephone (516) 357-3700 • Facsimile (516) 357-3792**

*MELISSA MANNA*  
**ASSOCIATE**  
**DIRECT: 516-357-3753**  
**FAX: 516-357-3792**  
**E-MAIL MMANNA@CULLENANDDYKMAN.COM**

November 21, 2019

Subin Associates, LLP  
Attn: Maria C. Zieher, Esq.  
150 Broadway, 23<sup>rd</sup> Floor  
New York, New York 10038

Re: Hadmira C. Leacock v. Speedway LLC  
D/Loss : 6/5/18  
Our File No. : 23005-26

Dear Ms. Zieher:

Please mark your file to reflect that Cullen and Dykman LLP has taken over the defense of Speedway, LLC. Our consent to change attorneys was filed back on October 9, 2019, and this office appeared at the Preliminary Conference, however mail is apparently still going to the prior firm.

Please be advised that we are in receipt of your supplemental bill of particulars, however numerous deficiencies remain. Please provide complete and proper responses as to where the alleged accident occurred.

Additionally, we have still not received duly executed HIPAA compliant authorizations made out Cullen and Dykman LLP, for all of your client's treatment providers, including radiological records, collateral source, FDNY ambulance/pre-hospital care reports, and authorizations to obtain your client's IRS tax returns in light of the lost earnings claim and the allegation that your client is self-employed.

Finally, we have still not received a response to our demand for Ad Damnum. The demand for ad damnum is proper under CPLR 3017 (c) and must be responded to within 15 days. As such, your response to same is overdue.

Please accept the foregoing as ever good faith attempt to obtain proper and complete responses to our discovery demands without the necessity of motion practice. Please provide responses to the demands within the next 10 business days.

Thank you for your prompt attention to the foregoing.

Very truly yours,

MELISSA MANNA